

EXHIBIT 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARNEGIE INSTITUTION OF WASHINGTON,
M7D CORPORATION,

Plaintiffs,

v.

FENIX DIAMONDS LLC,

Defendant.

Civil Action No. 1:20-cv-00200

**PLAINTIFFS' SECOND SET OF REQUESTS TO FENIX FOR THE
PRODUCTION OF DOCUMENTS AND THINGS (NO. 92)**

Pursuant to Fed. R. Civ. P. Rules 26 and 34 and Local Civil Rule 26.3, Plaintiffs Carnegie Institution of Washington and M7D Corporation (collectively, "Plaintiffs") hereby request that Defendant Fenix Diamonds LLC ("Fenix") produce the following documents and things within 30 days at a place and in a manner as agreed to by counsel for the parties.

These Requests are continuing in nature, and any additional responsive documents or things that may be discovered subsequent to the initial responsive production should be produced within a reasonable time following such discovery pursuant to Fed. R. Civ. P. 26.

DEFINITIONS AND INSTRUCTIONS

Plaintiffs incorporate in full the Definitions and Instructions from Plaintiffs' First Set of Requests to Fenix for the Production of Documents and Things (Nos. 1-91).

PLAINTIFFS' SECOND SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS
Request for Production No. 92:

Representative samples of diamonds of the type typically manufactured for and/or sold by Fenix, of the type used to make a cut diamond having a carat weight of at least 1 carat, a color of at least H or better and a clarity of at least SI2 or better, including: 1) five rough diamonds

before the flash is cut off; 2) five rough diamonds after the flash is cut off; 3) five rough diamonds after they are annealed to reduce color and/or opacity; 4) five rough diamonds of each fancy color after they are annealed; and 5) five cut and polished diamonds.

June 4, 2020

Respectfully submitted,

PERKINS COIE LLP

By: /s/ Matthew J. Moffa

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*Counsel for Plaintiffs
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M7D Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2020, I caused to be served copies of the foregoing PLAINTIFFS' SECOND SET OF REQUESTS TO FENIX FOR THE PRODUCTION OF DOCUMENTS AND THINGS (NO. 92) on the following counsel via email:

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Dated: June 4, 2020

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